

This is not the official court record. Official records of court proceedings may only be obtained directly from the court maintaining a particular record.

Hannelore Boorn v. Caesars Enterprise Services, LLC, Caesars Riverboat Casino, LLC

Case Number	31C01-2011-CT-000046
Court	Harrison Circuit Court
Type	CT - Civil Tort
Filed	11/17/2020
Status	11/17/2020 , Pending (active)

Parties to the Case

Defendant Caesars Enterprise Services, LLC

Address

Corporation Service Company
135 North Pennsylvania St., Suite 1610
Indianapolis, IN 46204

Defendant Caesars Riverboat Casino, LLC

Address

Corporation Service Company
135 North Pennsylvania St., Suite 1610
Indianapolis, IN 46204

Plaintiff Boorn, Hannelore

Attorney

Kenneth Charles Pierce
#2371010, Retained

416 Meigs Avenue
Jeffersonville, IN 47130
812-283-8577(W)

Chronological Case Summary

11/17/2020	Case Opened as a New Filing
11/17/2020	Appearance Filed
	Appearance
	For Party: Boorn, Hannelore
	File Stamp: 11/17/2020
11/17/2020	Complaint/Equivalent Pleading Filed
	Complaint
	Filed By: Boorn, Hannelore
	File Stamp: 11/17/2020

11/17/2020 **Subpoena/Summons Filed**
 Summons
 Filed By: Boorn, Hannelore
 File Stamp: 11/17/2020

11/17/2020 **Subpoena/Summons Filed**
 Summons
 Filed By: Boorn, Hannelore
 File Stamp: 11/17/2020

12/01/2020 **Document Filed**
 Counsel's Proof of Service and return receipt
 Filed By: Boorn, Hannelore
 File Stamp: 11/30/2020

12/07/2020 **Document Filed**
 Counsel's Proof of Service and return receipt to Caesars Enterprise Services LLC
 Filed By: Boorn, Hannelore
 File Stamp: 12/04/2020

Financial Information

* Financial Balances reflected are current representations of transactions processed by the Clerk's Office. Please note that any balance due does not reflect interest that has accrued – if applicable – since the last payment. For questions/concerns regarding balances shown, please contact the Clerk's Office.

Boorn, Hannelore

Plaintiff

Balance Due (as of 12/11/2020)

0.00

Charge Summary

Description	Amount	Credit	Payment
Court Costs and Filing Fees	157.00	0.00	157.00

Transaction Summary

Date	Description	Amount
11/17/2020	Transaction Assessment	157.00
11/17/2020	Electronic Payment	(157.00)

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31C01-2011-CT-000046

Harrison Circuit Court

Filed: 11/17/2020 1:08 PM
Harrison County Clerk
Harrison County, Indiana

**IN THE CIRCUIT/SUPERIOR COURT FOR HARRISON COUNTY
STATE OF INDIANA**

HANNELORE BOORN

Plaintiff

vs.

CAESARS ENTERPRISE SERVICES, LLC

**Serve : Corporation Service Company
135 North Pennsylvania Street
Suite 1610
Indianapolis, Indiana 46204**

AND

CAESARS RIVERBOAT CASINO, LLC

**Serve : Corporation Service Company
135 North Pennsylvania Street
Suite 1610
Indianapolis, Indiana 46204**

Defendants

* * * * *

COMPLAINT

Comes the Plaintiff, Hannelore Boorn, by and through counsel, and for her cause of action against the Defendants states as follows:

I.

At all times material hereto, the Plaintiff was a resident of Lexington, Kentucky.

II.

At all times material hereto, the Defendant, Caesars Enterprise Services, LLC was a duly licensed corporation active and in good standing doing business as Caesars Southern

Indiana Hotel and Casino. The agent for service of process is Corporation Service Company, 135 North Pennsylvania Street, Suite 1610, Indianapolis, Indiana 46204.

III.

At all times material hereto, the Defendant, Caesars Riverboat Casino, LLC was a duly licensed corporation active and in good standing doing business as Caesars Southern Indiana Hotel and Casino. The agent for service of process is Corporation Service Company, 135 North Pennsylvania Street, Suite 1610, Indianapolis, Indiana 46204.

IV.

On or about January 1, 2020 the Plaintiff was a business invitee at the premises owned, operated and maintained by the Defendants, by and through their agents and/or employees. On said date, the Defendants, by and through their agents and/or employees, negligently failed to provide safe premises for the Plaintiff.

V.

As a direct and proximate result of the negligence of the Defendants, by and through their agents and/or employees, the Plaintiff sustained permanent personal injuries, she has incurred medical expense and will incur such expense in the future, she has lost income, her capacity to earn money has been permanently impaired and she has and will in the future endure pain and suffering, both physical and mental.

WHEREFORE, the Plaintiff demands judgment against the Defendants in an amount sufficient to establish the jurisdiction of this Court, for her costs herein expended, and for any and all other just and proper relief to which Plaintiff may appear entitled.

PLAINTIFF DEMANDS TRIAL BY JURY.

Respectfully submitted,

/s/ Kenneth C. Pierce, II

Kenneth C. Pierce, II
INDIANA BAR #23710-10
416 Meigs Avenue
Jeffersonville, Indiana 47130
(812) 283-8577

Jeffrey T. Sampson
INDIANA BAR #499-95-TA
THE SAMPSON LAW FIRM
1154 South Third Street
Louisville, Kentucky 40203
(502) 584-5050

COUNSEL FOR PLAINTIFF

31C01-2011-CT-000046

Harrison Circuit Court

Filed: 11/17/2020 1:08 PM
Harrison County Clerk
Harrison County, IndianaIN THE CIRCUIT/SUPERIOR COURT FOR HARRISON COUNTY-
STATE OF INDIANA

HANNELORE BOORN

Case No. _____

Plaintiff

vs.

CAESARS ENTERPRISE SERVICES, LLC
AND
CAESARS RIVERBOAT CASINO, LLC

Defendants

APPEARANCE BY ATTORNEY IN CIVIL CASE**Party Classification:** **Initiating**

1. The undersigned attorney and all attorneys listed on this form now appear in this case for the following party member(s): Hannelore Boorn

2. Applicable attorney information for service as required by Trial Rule 5(B)(2) and for case information as required by Trial Rules 3.1 and 77(B) is as follows:

Name:	Kenneth C. Pierce, II	Attorney Number:	#23710-10
Address:	416 Meigs Avenue	Phone:	(812)283-8577
	Jeffersonville, IN 47130	E-mail:	<u>jeff@slfttrial.com</u>

3. There are other party members: No

4. If first party filing this case, the clerk is requested to assign this case the following Case Type under Administrative Rule 8(b)(3): Not applicable

5. I will accept service by FAX at the above noted number: No

6. This case involves support issues: No

7. There are related cases: No

8. This form has been served on all parties. Certificate of Service is attached: Yes

/s/ Kenneth C. Pierce, II
Kenneth C. Pierce, II

CERTIFICATE OF SERVICE

Service of the foregoing was made by placing a copy of the same into the United States Mail, this 13th day of November, 2020, addressed to:

Corporation Service Company
135 North Pennsylvania Street
Suite 1610
Indianapolis, Indiana 46204

/s/ Kenneth C. Pierce, II

Kenneth C. Pierce, II
INDIANA BAR #23710-10
416 Meigs Avenue
Jeffersonville, Indiana 47130
(812) 283-8577

Jeffrey T. Sampson
INDIANA BAR #499-95-TA
THE SAMPSON LAW FIRM
1154 South Third Street
Louisville, Kentucky 40203
(502) 584-5050

COUNSEL FOR PLAINTIFF

IN THE CIRCUIT COURT FOR HARRISON COUNTY
STATE OF INDIANA

HANNELORE BOORN

PLAINTIFF,

VS.

CAESARS ENTERPRISE SERVICES, LLC and
CAESARS RIVERBOAT CASINO, LLC

DEFENDANTS

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) **CAUSE NO. 31C01-2011-CT-000046**
) *Electronically Filed*
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E-FILING APPEARANCE BY ATTORNEY IN CIVIL CASE

1. The party on whose behalf this form is being filed is:

Initiating _____ Responding X Intervening _____ ; and

the undersigned attorney and all attorneys listed on this form now appear in this case for the following parties:

Name of party: Caesars Riverboat Casino, LLC and Caesars Enterprise Services, LLC

Address of party: 11999 Casino Center Drive Elizabeth, IN 47117

Telephone number of party: 1-866-676-7463

2. The attorneys response for the representation of the above identified initiating party is:

Name: Douglas P. Dawson

Attorney No. 29645-22

Address: Walters Richardson, PLLC
920 Lily Creek Rd., Ste. 102
Louisville, KY 40243

Telephone No.: 502-785-9090
Fax No.: 502-742-0326
Email: Doug@WaltersRichardson.com

3. Undersigned certifies that the contact information listed on the Indiana Supreme Court Roll of Attorneys for each attorney is current and accurate as of the date the appearance is filed.

4. Undersigned acknowledges that all orders, opinions, notices and all documents served under Trial Rule 86(G) will be sent to the attorney at the email address(es) on the Indiana Roll of Attorneys regardless of other contact information supplied by the attorney; and

5. Undersigned acknowledges that it is their sole responsibility for keeping their contact information with the Indiana Roll of Attorneys accurate per Ind. Admis. Disc. R. 2(A).

Respectfully submitted,

WALTERS RICHARDSON, PLLC

/s/ Douglas P. Dawson

Douglas P. Dawson (Bar #: 29645-22)
920 Lily Creek Road, Suite 102
Louisville, Kentucky 40243
Telephone: (502) 785-9090
Facsimile: (502) 742-0326
Email: Doug@WaltersRichardson.com
COUNSEL FOR DEFENDANTS,
CAESARS ENTERPRISE SERVICES, LLC AND
CAESARS RIVERBOAT CASINO, LLC

CERTIFICATE OF SERVICE

This is to certify that the foregoing has been served on the following on the 11th day of December, 2020 via the Indiana E-Filing System:

Kenneth C. Pierce, II
416 Meigs Avenue
Jeffersonville, IN 47130
Counsel for Plaintiff

Jeffrey T. Sampson
The Sampson Law Firm
1154 South Third Street
Louisville, KY 40203
Co-Counsel for Plaintiff

/s/ Douglas P. Dawson

COUNSEL FOR DEFENDANTS,
CAESARS ENTERPRISE SERVICES, LLC AND
CAESARS RIVERBOAT CASINO, LLC

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IN THE CIRCUIT COURT FOR HARRISON COUNTY
STATE OF INDIANA

HANNELORE BOORN

PLAINTIFF,

VS.

CAESARS ENTERPRISE SERVICES, LLC and
CAESARS RIVERBOAT CASINO, LLC

DEFENDANTS

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) **CAUSE NO. 31C01-2011-CT-000046**
) *Electronically Filed*
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NOTICE OF FILING OF NOTICE OF REMOVAL

Please take notice that, pursuant to 28 U.S.C. § 1446(d), Defendants, Caesars Riverboat Casino, LLC and Caesars Enterprise Services, LLC, have on this 11th day of December 2020 removed this action by filing a Notice of Removal in the United States District Court for the Southern District of Indiana, New Albany Division, together with a complete copy of all process, pleadings, and orders served upon these Defendants in the state court action as of the date of the filing of the removal. A complete, true, and correct copy of such Notice of Removal, without exhibits, is attached hereto as Exhibit A.

Respectfully submitted,

WALTERS RICHARDSON, PLLC

/s/ *Douglas P. Dawson*

Douglas P. Dawson (Bar #: 29645-22)
920 Lily Creek Road, Suite 102
Louisville, Kentucky 40243
Telephone: (502) 785-9090
Facsimile: (502) 742-0326
Email: Doug@WaltersRichardson.com
COUNSEL FOR DEFENDANTS,
CAESARS ENTERPRISE SERVICES, LLC AND
CAESARS RIVERBOAT CASINO, LLC

CERTIFICATE OF SERVICE

This is to certify that the foregoing has been served on the following on the 11th day of December, 2020 via the Indiana E-Filing System:

Kenneth C. Pierce, II
416 Meigs Avenue
Jeffersonville, IN 47130
Counsel for Plaintiff

Jeffrey T. Sampson
The Sampson Law Firm
1154 South Third Street
Louisville, KY 40203
Co-Counsel for Plaintiff

/s/ Douglas P. Dawson

COUNSEL FOR DEFENDANTS,
CAESARS ENTERPRISE SERVICES, LLC AND
CAESARS RIVERBOAT CASINO, LLC